REMARKS/ARGUMENTS

The final Office Action of January 12, 2006, has been carefully reviewed and these remarks are responsive thereto. Claims 1, 4, 11 and 19 have been amended. No new matter has been added. Claims 1-27 thus remain pending in this application. Reconsideration and allowance of the instant application are respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 1-3, 7-8, 10, 11-13, 15-16, 18-21, 23-25, and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mander *et al.* (U.S. Pat. No. 6,243,724, hereinafter Mander) in view of Kiessig *et al.* (U.S. Patent Publ. No. 2005/0027757, hereinafter "Kiessig"). Claims 4-6, 9, 14, 17, 22, and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mander in view of Kiessig and further in view of Chao *et al.* (U.S. Publ. Appl. No. 2002/0169678 A1, hereinafter "Chao"). Applicants respectfully traverse these rejections for at least the following reasons.

Amended independent claims 1, 11 and 19 relate to, *inter alia*, generating an entry template based on a relationship type of a created list, wherein the entry list template includes one or more item properties corresponding to the relationship type. The claims further relate to generating a list entry, in accordance with the entry template, representing an association between an item to be added and a root list item. Neither Mander nor Kiessig, either separately or in combination, teaches or suggests such a feature. Significantly, Kiessig is devoid of any teaching or suggestion of list entry templates, much less generating an entry template based on a relationship type of the list. In fact, the Office Action relies solely on Mander to allegedly disclose this feature. Mander generally discloses a method for creating a collection or pile of documents. In particular, Mander discloses a method for creating a new pile at col. 8, line 37 – col. 9, line 43, by placing documents of a pile in a subdirectory. Alternatively, Mander discloses that a pile may be created by altering the graphical representation of the separate documents and modifying the pathname of both documents. Col. 9, ll. 30-39. In yet another alternative, Mander discloses that the system may provide the user with an "empty base" for placing documents thereon to create a new pile. Col. 9, ll. 41-43. However, none of the above disclosures constitute generating a list entry template based on a relationship type, much less generating a list entry

relationship in accordance with the generated entry template. The Office Action, at p. 7, asserts that Mander discloses list entry templates at col. 12, lines 35-67 and col. 35, lines 5-13. Applicants respectfully disagree. The cited figures and passages relate to user defined scripts and criteria for storing and organizing documents or files in a pile. More specifically, scripts are used, in one instance, to automatically file new mail documents in a particular subpile. Col. 21, ll. 21-35. Thus, while Mander's scripts establish rules for organizing documents in a pile, they do not provide a template, generated based on a relationship type, *for creating list entries that are to be added to a list* (i.e., a pile). In other words, Mander's scripts do not define *how* a list entry is to be created.

Chao is similarly deficient. At most, Chao discloses object models for providing various functionalities in software applications. ¶ 26. In particular, Chao describes a relationship object model which models a relationship between two objects (e.g., a supplier and a provider). ¶ 139. However, a pre-programmed and pre-defined object model does not equate to a list entry template that is generated based on a relationship type of the list. Chao's relationship object model is a *generic, abstract* data structure for modeling a *variety* of relationships between entities. ¶ 138. In addition, nowhere does Chao teach or suggest that the relationship object model serves as a basis for the generation of *list entries*, as is the case with the list entry template of claims 1, 11 and 19. As such, claims 1, 11 and 19 are allowable for at least this reason.

Claims 2-10, 12-18 and 20-27 are dependent on claims 1, 11 and 19, respectively and are thus allowable for at least the same reasons as claims 1, 11 and 19 and further in view of the novel and non-obvious features recited therein. For example, claims 5, 6, 23 and 24 recite, *inter alia*, "wherein moving includes deleting the entry from the original list and generating an entry in the new list and copying the value for any property that the new list's relationship type has in common with the original list's relationship type." The Office Action concedes on p. 13 that neither Mander nor Kiessig teach or suggest such a feature. Instead, the Office Action relies on Chao to allegedly teach a list of additional relationship types, for each to-level relationship type, that can be nested in common with an original list. Applicants respectfully submit that such a disclosure still does not teach or suggest "copying the value for any property that the new list's relationship type has in common with the original list's relationship type." Merely having common relationship types does not equate to copying the value of common properties of an

original relationship type and a new relationship type of the item to be moved. Further, nowhere does Chao even teach or suggest common properties of an original and a new relationship type of the item to be moved. Significantly, the Office Action fails to even address the features of claim 6. Claims 5, 6, 23 and 24 are thus allowable for this additional reason.

CONCLUSION

All rejections having been addressed, Applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the examiner is requested to contact the undersigned at (202) 824-3156.

Respectfully submitted,

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Dated this 13th day of March, 2006   By: _____

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